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March 26, 2012

VIA EMAIL AND ECF

Carolyn Pokorny, Esq.
Roger Burlingame. Esq.
Todd Kaminsky, Esq.
Unites States Attorney's Office
Eastern District of New York
271 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Pedro Espada, Jr., et al., 10-CR-985 (FB)

Dear Ms. Pokorny,

On reviewing William Riordan's 3500 material and reports, I have noticed that there are no notes from him concerning telephone conversations with your office or concerning what documents he was asked to examine. There are also no notes or emails showing the work that he did in the course of his examination.

All handwritten notes or typed documents created by William Riordan concerning any handwriting analysis he performed in this case, or conversations he had with anyone from your office or any agent acting on your behalf concerning any handwriting analysis he did in connection to this case, are prior statements of William Riordan and 3500 material.

HAFETZ NECHELES & ROCCO

Please turn over any such documents immediately.

Very truly yours.

By: /s/Susan R. Necheles
Susan R. Necheles
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Attorney for Pedro Gautier Espada